

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

MICHAEL LEASE

Plaintiff,

v.

STRYKER CORPORATION, STRYKER
ORTHOPAEDICS, and STRYKER SALES
CORPORATION.

Defendants.

Civil Action No.

NOTICE OF REMOVAL

**TO THE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA:**

PLEASE TAKE NOTICE that Defendant Stryker Corporation (“Stryker” or “Defendant”), hereby files this Notice of Removal of the above-captioned action from the Court of Common Pleas, Berks County, Docket No. 19-15093, pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, on the basis of the facts set forth below:

1. On July 31, 2019, Plaintiff Michael Lease (“Plaintiff”) filed a Praecipe to Issue Writ of Summons in the Court of Common Pleas, Berks County, Docket No. 19-15093 against Defendants. (Copies of the Praecipe to Issue Writ of Summons and the Summons are attached hereto as Exhibit “A”.) The Summons was served on Stryker Corporation by certified mail. No Complaint was filed or served at that time.

2. Stryker filed a Notice of Appearance and a Rule to File Complaint on May 26, 2020, and May 27, 2020, respectively. *See* Exhibit “B” and Exhibit “C”.

3. On June 2, 2020, Plaintiff electronically filed a Complaint (attached hereto as Exhibit “D”). The Complaint indicated that Plaintiff was a resident of Reading, Pennsylvania, and sought damages on one cause of action for “an amount in excess of \$50,000”. *Id.* at ¶1.

4. Counsel for Defendant received the filing of the Complaint by electronic notice from the Court on June 2, 2020. The Complaint alleges personal injuries arising out of implantation of LFIT V40 Femoral Head and Accolade II Neck Angle Hip Stem which Plaintiff received as part of a total hip arthroplasty on October 5, 2015, and that he underwent a revision surgery on or about February 6, 2018. Exhibit “D” at ¶¶8; 15.

5. This Notice of Removal is timely filed within 30 days after filing and receipt of the Complaint by Defendant.

6. The parties are of diverse citizenship:

(a) Defendant Stryker Corporation is a Michigan corporation with its principal place of business at 2825 Airview Road, Kalamazoo, Michigan 49004;

(b) Plaintiff is a Pennsylvania resident, as set forth above in Paragraph 2; and

(d) No other parties have been properly served with the Complaint. Moreover, the other named parties are not Pennsylvania Corporations, nor do they have a principal place of business in Pennsylvania.¹

7. Regarding the requirement that the amount in controversy exceed \$75,000 (*see* 28 U.S.C. §1332(a)), Plaintiff alleges that he is seeking an amount in excess of \$50,000.

8. However, the amount in controversy requirement is alternatively satisfied by the allegations of Plaintiff’s injuries in the Complaint. The Court’s determination of the amount in

¹ Stryker Sales Corporation (“Stryker Sales”) is a Michigan corporation with its principal place of business in Michigan. Howmedica Osteonics Corp. (which has done business as “Stryker Orthopaedics”) (hereinafter “HOC”) is a New Jersey corporation with its principal place of business in New Jersey. Both Stryker Sales and HOC are wholly owned subsidiaries of Stryker Corporation, and in the event that service on either or both was found to be valid, both entities consent to this removal.

controversy is not measured “by the low end of an open-ended claim, but rather by a reasonable reading of the value of the rights being litigated.” *See Werwinski v. Ford Motor Co.*, 286 F.3d 661, 666 (3d Cir. 2002) (quoting *Angus v. Shiley Inc.*, 989 F.2d 142, 146 (3d Cir. 1993)). In applying the “legal certainty” test to assess the amount in controversy requirement, the Court of Appeals for the Third Circuit has stated that “dismissal is appropriate only if the federal court is certain that the jurisdictional amount cannot be met.” *See Columbia Gas Transmission Corp. v. Tarbuck*, 62 F.2d 538, 541 (3d Cir. 1995); *see also Samuel Bassett v. KIA Motors America, Inc.*, 357 F.3d 392, 398 (3d Cir. 2004) (recommending that District Court adhere to the “legal certainty test”).

9. This products liability action involves allegations of “serious permanent injury”, including “adverse local tissue reaction metal-on-metal trunnions debris with likely aseptic loosening [sic] of the acetabular component,” as a result of an allegedly defective LFIT V40 Head. *See* Complaint at ¶¶16, 19. Plaintiff claims that he was required to undergo a second surgery to remove the device, that he has been unable to perform his usual and daily occupations and duties for an indefinite period of time, and he also asserts a lost wage claim. *Id.* at ¶¶19, 20. Under any reasonable estimation of how a jury could value the elements of damages as alleged in Plaintiff’s Complaint, the amount in controversy requirement has been satisfied.

10. Upon information and belief this court has original jurisdiction under 28 U.S.C. §1332 for the reasons set forth above.

11. This Notice of Removal is being filed in the United States District Court for the Eastern District of Pennsylvania, the District Court of the United States for the district and division within which the state court action is pending, as required by 28 U.S.C. §§ 1446(a) and 1441(a).

12. Pursuant to 28 U.S.C. §1446(d), written notice of the filing of this Notice of Removal will be given to Plaintiff, and a copy of the Notice of Removal will be filed with the Prothonotary of the Court of Common Pleas, Berks County, in the form attached hereto as Exhibit “E”.

13. This Notice of Removal is signed pursuant to Rule 11 of the Federal Rules of Civil Procedure, as required by 28 U.S.C. § 1446(a).

WHEREFORE, Defendant Stryker Corporation respectfully request that this action be duly removed to this Court, and that it proceed herein.

GIBBONS P.C
Attorneys for Defendants
Stryker Corporation
One Logan Square
Philadelphia, PA 19103-2769
(215) 446-6201
sfinley@gibbonslaw.com

Dated: June 11, 2020

By: s/Stephen J. Finley
Stephen J. Finley, Esq.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

MICHAEL LEASE

Plaintiff,

v.

STRYKER CORPORATION, STRYKER
ORTHOPAEDICS, and STRYKER SALES
CORPORATION.

Defendants.

Civil Action No.

Certificate of Service

Stephen J. Finley, hereby certifies as follows:

1. I am a Director of the law firm of Gibbons P.C., attorneys for Defendant Stryker Corporation in the above-entitled action.

2. On this date, my office served, via ECF, to the Clerk of the Court of the United States District Court for the Eastern District of Pennsylvania, 601 Market Street, Room 2609, Philadelphia, PA 19106-1797 a copy of Defendants' Notice of Removal and accompanying exhibits.

3. Also on this date, my office served, via email, a copy of Defendant's Notice of Removal, Notice of Filing of Notice of Removal, all with accompanying exhibits, and this certification of service upon Attorneys for Plaintiff:

Edwin L. Stock, Esq.
Roland Rick Stock
627 North Fourth Street
Reading, PA 19603
estock@rrslegal.com

I certify under penalty of perjury that the foregoing is true and correct.

By: s/Stephen J. Finley
Stephen J. Finley, Esq.

Dated: Philadelphia, Pennsylvania
June 11, 2020

EXHIBIT “A”

ROLAND RICK STOCK

By: Edwin L. Stock, Esq.

Attorney I.D. No. 43787

By: Frank N. D'Amore, Esquire

Attorney I.D. No. 322970

627 North Fourth Street

P.O. Box 902

Reading, Pennsylvania 19603-0902

Telephone: (610) 372-5588

Fax (610) 372-5957

Attorney for Plaintiff

MICHAEL LEASE : IN THE COURT OF COMMON PLEAS OF
 Plaintiff : BERKS COUNTY, PENNSYLVANIA

v.

CIVIL ACTION – LAW

STRYKER CORPORATION,
 STRYKER ORTHOPAEDICS, &
 STRYKER SALES
 CORPORATION

No.

Defendants

JURY TRIAL DEMANDED

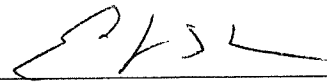
PRAECIPE FOR WRIT OF SUMMONS

TO THE PROTHONOTARY:

Issue summons in the above-captioned case.

Date:

7/31/19


 ROLAND RICK STOCK
 Edwin L. Stock, Esquire
 Attorney I.D. # 43787
 Frank N. D'Amore, Esquire
 Attorney I.D. #322970
 627 North Fourth Street
 P.O. Box 902
 Reading, PA 19603-0902

Telephone: (610) 372-5588

ROLAND RICK STOCK

By: Edwin L. Stock, Esquire
 Attorney I.D. No. 43787
 Frank N. D'Amore, Esquire
 Attorney I.D. No. 322970
 627 North Fourth Street
 P.O. Box 902
 Reading, Pennsylvania 19603-0902
 Telephone: (610) 372-5588
 Fax (610) 372-5957

Attorney for Plaintiff

MICHAEL LEASE	:	IN THE COURT OF COMMON PLEAS OF
Plaintiff	:	BERKS COUNTY, PENNSYLVANIA
	:	
v.	:	CIVIL ACTION – LAW
	:	
STRYKER CORPORATION,	:	
STRYKER ORTHOPAEDICS, &	:	No. 19-15093
STRYKER SALES	:	
CORPORATION	:	
Defendants	:	JURY TRIAL DEMANDED
	:	
	:	

SUMMONS IN A CIVIL ACTION

TO: Stryker Corporation	Stryker Orthopaedics
2825 Airview Boulevard	2825 Airview Boulevard
Kalamazoo, MI 49002	Kalamazoo, MI 49002

Stryker Sales Corporation
 3800 East Central Avenue
 Pontage, MI 49002

YOU ARE NOTIFIED THAT PLAINTIFF, MICHAEL LEASE, HAS COMMENCED
 AN ACTION AGAINST YOU.

PROTHONOTARY

Date: 08/01/2019

Melanie Cline, Deputy
 Jonathan K. Del Collo, Prothonotary

Writ Issued to Attorney 19-15093
 Berks County Prothonotary Office

FDA/40370-0/00376694 v.



Received County of Berks Prothonotary's Office on 8/1/2019 3:58:55 PM Prothonotary Docket No. 19-15093
 Received County of Berks Prothonotary's Office on 07/31/2019 2:10 PM Prothonotary Docket No. 19-15093

Received County of Berks Prothonotary's Office on 07/31/2019 2:10 PM Prothonotary Docket No. 19-15093

ROLAND RICK STOCK

By: Edwin L. Stock, Esquire

Attorney I.D. No. 43787

Frank N. D'Amore, Esquire

Attorney I.D. No. 322970

627 North Fourth Street

P.O. Box 902

Reading, Pennsylvania 19603-0902

Telephone: (610) 372-5588

Fax (610) 372-5957

Attorney for Plaintiff

MICHAEL LEASE	:	IN THE COURT OF COMMON PLEAS OF
Plaintiff	:	BERKS COUNTY, PENNSYLVANIA
	:	
v.	:	CIVIL ACTION – LAW
	:	
STRYKER CORPORATION,	:	
STRYKER ORTHOPAEDICS, &	:	
STRYKER SALES	:	No.
CORPORATION	:	
Defendants	:	
	:	JURY TRIAL DEMANDED
	:	
	:	

SUMMONS IN A CIVIL ACTION

TO: Stryker Corporation	Stryker Orthopaedics
2825 Airview Boulevard	2825 Airview Boulevard
Kalamazoo, MI 49002	Kalamazoo, MI 49002
 Stryker Sales Corporation	
3800 East Central Avenue	
Pontage, MI 49002	

YOU ARE NOTIFIED THAT PLAINTIFF, MICHAEL LEASE, HAS COMMENCED AN ACTION AGAINST YOU.

PROTHONOTARY

Date: _____

Jonathan K. Del Collo, Prothonotary

EXHIBIT “B”

GIBBONS P.C.
 Stephen J. Finley
 IDENTIFICATION NO. 200890
 One Logan Square
 130 North 18th Street, Suite 1210
 Philadelphia, PA 19103
 (215) 665-0400 (phone)
 (215) 636-0366 (fax)
 sfinley@gibbonslaw.com

*Attorneys for Defendant
 Stryker Corporation*

MICHAEL LEASE,	:	COURT OF COMMON PLEAS
Plaintiff	:	BERKS COUNTY
	:	
v.	:	NO. 2019-15093
	:	
STRYKER CORPORATION, STRYKER	:	
ORTHOPAEDICS, & STRYKER SALES	:	
CORPORATION,	:	
Defendant	:	
	:	

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance for Defendant Stryker Corporation in the above-captioned matter.

GIBBONS P.C.

BY: s/Stephen J. Finley
 Stephen J. Finley

Dated: May 26, 2020

*Attorneys for Defendant
 Stryker Corporation*

Received County of Berks Prothonotary's Office on 05/26/2020 2:00 PM Prothonotary Docket No. 19-15093

CERTIFICATE OF SERVICE

I, Stephen J. Finley, Esquire, certify that the foregoing Entry of Appearance has been filed with the Court and served on the following via the Court's electronic filing system and U.S. mail on the 26th day May, 2020.

Edwin L. Stock, Esquire
Roland Rick Stock
627 North Fourth Street
Reading, PA 19603
Attorneys for Plaintiff

s/Stephen J. Finley
Stephen J. Finley

Received County of Berks Prothonotary's Office on 05/26/2020 2:00 PM Prothonotary Docket No. 19-15093

EXHIBIT “C”

MICHAEL LEASE, : COURT OF COMMON PLEAS
Plaintiff : BERKS COUNTY
V. : NO. 2019-15093
STRYKER CORPORATION, STRYKER :
ORTHOPAEDICS, & STRYKER SALES :
CORPORATION, :
Defendant :

RULE TO FILE COMPLAINT

To: *Frank N. D'Amore*, Esquire
Roland Rick Stock
627 North Fourth Street
Reading, PA 1960

AND NOW, this *27th* day of *May*, 2020, a Rule is hereby
issued and entered upon Plaintiff, Michael Lease, to file a Complaint in the above-captioned
action within twenty (20) days of the service hereof, or suffer an entry of judgment of *non pros*.

~~JOSEPH K. DEL COLLO~~, PROTHONOTARY

Date: *5/27/2020*

By: *Emil M. Wyzet* (SEAL)
Deputy

Rule Issued to Attorney 19-15093

Berks County Prothonotary Office



4987343 R

5/27/2020 12:08 PM



2832822.1 100909-101530

Received County of Berks Prothonotary's Office on 5/27/2020 12:08:42 PM Prothonotary Docket No. 19-15093
Received County of Berks Prothonotary's Office on 05/27/2020 9:46 AM Prothonotary Docket No. 19-15093

EXHIBIT “D”



**RICK | STOCK
LAW**

RRS Legal, LLC

Charles A. Rick
Edwin L. Stock
Sandra M. Liberatori
Eric S. Steckerl
Michael R. McFarlin
Geraldine M. Linn
Frank D'Amore

A Limited Liability Company

info@rrslegal.com
www.rrslegal.com

estock@rrslegal.com

June 3, 2020

Via Email – sfinley@gibbsonlaw.com

Stephen J. Finley, Esquire
GIBBONS P.C.
One Logan Square
130 North 18th Street, Suite 1210
Philadelphia, PA 19103

Re: Michael Lease v. Stryker Corporation, et al.
Berks County CCP; Docket No. 19-15093

Dear Mr. Finley:

Enclosed please find Plaintiff's Complaint which has been electronically filed with the Court in connection with the above matter.

Very truly yours,

RICK STOCK LAW



Edwin L. Stock

ELS/ktk
Enclosure

MICHAEL LEASE
Plaintiffs

v.

STRYKER CORPORATION,
STRYKER ORTHOPAEDICS,
& STRYKER SALES CORPORATION

: IN THE COURT OF COMMON PLEAS OF
: BERKS, PENNSYLVANIA
: CIVIL ACTION

: NO. 19-15093

: JURY TRIAL DEMANDED

**NOTICE TO DEFEND
NOTIFICACION PARA DEFENDERSE**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyers' Referral Service of the
Berks County Bar Association
544 Court Street
Reading, Pennsylvania 19601
Telephone (610) 375-4591
www.BerksBar.org

AVISO

Le han demandado a usted en el tribunal. Si usted quiere defenderse de las demandas expuestas en las páginas siguientes, usted debe tomar acción en el plazo de veinte (20) días a partir de la fecha en que se le hizo entrega de la demanda y la notificación, al interponer una comparecencia escrita, en persona o por un abogado y registrando por escrito en el tribunal sus defensas o objeciones a las demandas en contra de su persona. Se le advierte que si usted no lo hace, el caso puede proceder sin usted y podría dictarse un fallo por el juez en contra suya sin notificación adicional y podría ser por cualquier dinero reclamado en la demanda o por cualquier otro reclamo o desagravio en la demanda solicitado por el demandante. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

USTED DEBE LLEVARLE ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O NO PUEDE CORRER CON LOS GASTOS DE UNO, VAYA O LLAME POR TELEFONO A LA OFICINA EXPUESTA ABAJO. ESTA OFICINA PUEDE POVEERLE INFORMACION RESPECTO A COMO CONTRATAR A UN ABOGADO.

SI NO PUEDE CORRER CON LOS GASTOS PARA CONTRATAR A UN ABOGADO, ESTA OFICINA PUDIERA PROVEERLE INFORMACION RESPECTO A INSTITUCIONES QUE PUEDAN OFRECER SERVICIOS LEGALES A PERSONAS QUE CALIFICAN PARA LA REDUCCION DE HONORARIOS O QUE NO TENGAN QUE PAGAR HONORARIOS.

Servicio de Recomendación para Contratar Abogados del
Colegio de Abogados del Condado Berks
544 Court Street
Reading, Pennsylvania 19601
Teléfono (610) 375-4591
www.BerksBar.org

MICHAEL LEASE	:	IN THE COURT OF COMMON PLEAS OF
Plaintiffs	:	BERKS, PENNSYLVANIA
	:	CIVIL ACTION
	:	
	:	
v.	:	
	:	NO. 19-15093
STRYKER CORPORATION,	:	
STRYKER ORTHOPAEDICS,	:	
& STRYKER SALES CORPORATION	:	
	:	JURY TRIAL DEMANDED

COMPLAINT

1. This is a Products Liability matter wherein the claim for damages exceeds the compulsory arbitration limit of \$50,000.00

2. Plaintiff is Michael Lease (hereinafter referred to as "Plaintiff"), an adult individual with an address of 123 Fake Street, Reading, PA 19601.

3. A Defendant is Stryker Corporation, a Michigan Corporation with an address at 2825 Airview Boulevard, Kalamazoo, MI 49002.

4. A Defendant is Stryker Orthopaedics, a Michigan Corporation with an address at 2825 Airview Boulevard, Kalamazoo, MI 49002.

5. A Defendant is Stryker Sales Corporation, a business entity with an address at 3800 East Central Avenue, Pontage, MI 49002.

6. Stryker Corporation, Stryker Orthopaedics, and Stryker Sales Corporation (hereinafter collectively referred to as "Defendants") are sellers, distributors, and/or manufacturers of medical implants and other materials for arthroplasty procedures.

7. Defendants are sellers, distributors, and/or manufacturers of implants and/or other materials used for arthroplasty procedures of the hip, including Femoral Heads, Femoral Stems, and Acetabular Cups.

8. Plaintiff underwent a total hip arthroplasty on October 05, 2015, requiring the placement of a Femoral Stem, Liner, Acetabular Cup, and Femoral Head.

9. The Femoral Head used in Plaintiff's Procedure was marketed as LFIT V40.

10. The Femoral Stem used was marketed as Accolade II Neck Angle Hip Stem.

11. Defendants sold, distributed, and/or manufactured the LFIT V40 Femoral Head at the time of Plaintiff's surgery.

12. Defendants sold, distributed, and/or manufactured the Accolade II Neck Angle Hip Stem at the time of Plaintiff's surgery.

13. Defendants placed the LFIT V40 and Accolade II Neck Angle Hip Stem components into the stream of commerce of the Commonwealth of Pennsylvania at the time of Plaintiff's procedure.

14. In or around August of 2017, Plaintiff began experiencing significant pain in his hip.

15. Plaintiff's pain continued to increase in severity, eventually requiring a total revision of his hip arthroplasty on February 06, 2018.

16. Plaintiff's post-operative diagnoses was a failed right total hip arthroplasty secondary to adverse local tissue reaction metal-on-metal trunnions debris with likely aseptic loosening of the acetabular component.

17. The LFIT V40 Femoral Head used in Plaintiff's procedure was defective due to no fault of Plaintiff and failed, requiring Plaintiff's second procedure.

18. The Accolade II Neck Angle Hip Stem used in Plaintiff's procedure was defective due to no fault of Plaintiff and failed, requiring Plaintiff's second procedure.

19. As a result of the defective LFIT V40 Femoral Head and Accolade II Neck Angle Hip Stem (hereinafter the “Components”), Plaintiff suffered serious personal injuries which include, but are not limited to significant pain and the recovery necessary from Plaintiff’s second surgery.

20. As a result of the defective Components, Plaintiff has been unable to perform his usual and daily occupations and duties and he may continue to be unable to perform his usual and daily occupations and duties for an indefinite period, all to his great detriment and loss.

21. As a result of the defective Components, Plaintiff has suffered past wage loss and/or future wage loss by way of lost earning capacity.

22. As a result of the defective Components, Plaintiff has been required to undergo painful surgeries from which he is still recovering and has incurred and/or will incur medical expenses in the future to his great detriment and loss. In addition, Plaintiff has incurred scarring, some or all of which will be permanent.

23. As a result of the defective Components, Plaintiff has been unable to perform and enjoy the normal and/or ordinary physical activities and pleasures of life, which will continue in the future.

COUNT I
PRODUCTS LIABILITY

24. Plaintiff hereby incorporates by reference paragraphs 1-23 as if they were set forth fully herein.

25. Defendant placed the Components into the stream of commerce of the Commonwealth of Pennsylvania.

26. The Components were used by medical professionals and Plaintiff according to a usual, customary, and ordinary practice

27. The danger of the Components was unknowable and unacceptable and therefore dangerous beyond an average or ordinary consumer's expectation.

26. The probability and seriousness of harm caused by the Components was outweighed the burden or costs of preventing said harm.

27. The Components were sold in a defective condition.

28. Plaintiff suffered damages as a result of the defective condition of the Components.

WHEREFORE, Plaintiff requests that the Court enter judgment in his favor and be awarded damages in an amount in excess of \$50,000.00, including attorney's fees and costs.

Date: 6/1/20

Respectfully submitted,

ROLAND RICK STOCK

By: 

Edwin L. Stock

PA ID No. 43787

Frank N. D'Amore, Esq.

PA ID No. 322970

627 North Fourth Street

P.O. Box 902

Reading, PA 19603-0902

Tel: 610-372-5588

Fax: 610-372-5957

Attorneys for Plaintiff

VERIFICATION

I, Michael Lease, Plaintiff in the above-captioned matter, verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities.

Date 9/26/19

Michael Lease
Michael Lease, *Plaintiff*

Kathelene Koller

From: noreply@countyofberks.com
Sent: Wednesday, June 3, 2020 8:15 AM
To: Kathelene Koller
Subject: E-Filing Acceptance Notification for 19 15093

A document has been filed for:

Caption: Lease, Michael Vs. Stryker Corporation
Docket Number: 19 15093
Case Type: Civil
Case SubType: Summons
Date of Entry on Docket: 6/3/2020

Filing Attorney: Edwin Stock
Document Type: Complaint
Document Type: Notice to Plead/Defend

Filing can be viewed through EFS in the 'My Cases' tab.

Please do not reply to this automated email address.

If you have questions, please contact the CivilEFS Helpdesk at either CivilEFS@countyofberks.com or (610) 898-5565.

Thank you,

Berks County Prothonotary Office

EXHIBIT “E”

Stephen J. Finley, Esq.
Identification No. 200890
One Logan Square
Philadelphia, PA 19103-2769
(215) 446-6201

*Attorneys for Defendants
Stryker Corporation*

MICHAEL LEASE

Plaintiff,

v.

STRYKER CORPORATION, STRYKER
ORTHOPAEDICS, and STRYKER SALES
CORPORATION.

Defendants.

COURT OF COMMON PLEAS
BERKS COUNTY

No. 2019-15093

NOTICE OF FILING NOTICE OF REMOVAL

TO: **PROTHONOTARY OF THE COURT OF COMMON PLEAS OF BERKS
COUNTY**

PLEASE TAKE NOTICE that in the above-entitled action Defendant Stryker Corporation has this day filed a Notice of Removal, a copy of which is attached hereto as Exhibit 1, in the office of the Clerk of the United States District Court for the Eastern District of Pennsylvania. A copy of the Notice of Removal is attached hereto as Exhibit 1.

A copy of the Notice of Removal and Notice of Filing Notice of Removal has been served upon counsel for Plaintiff.

GIBBONS P.C.
Attorneys for Defendants
Stryker Corporation

By: s/Stephen J. Finley
Stephen J. Finley, Esq.(Id. No. 200890)

Dated: Philadelphia, Pennsylvania
June 11, 2020